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November 26, 2018

VIA ECF

Hon. Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Justin Goldman v. Breitbart News Network, LLC et al.*, 17-cv-3144
(AJN) (SN)

Your Honor:

Pursuant to the Court's September 21, 2018 Order, we write on behalf of all Parties to provide the Court with an update on the status of discovery. Both Plaintiff and Defendants served initial sets of discovery in October. Last week Plaintiff, Oath Holdings Inc., and Gannett Company, Inc. served responses and objections to written discovery requests. Plaintiff granted Breitbart New Network, LLC, Heavy, Inc. and Time Inc. extensions of time to serve responses and objections. Time Inc.'s responses and objections are currently due today. Heavy, Inc.'s responses and objections are due November 29, 2018. Breitbart's deadline to respond is extended indefinitely while it discusses settlement with Plaintiff. Production of documents is ongoing. To date, each side has objected to and declined to produce certain categories of requested documents and information. The Parties are in the process of addressing these issues in an effort to resolve them without Court intervention. The Parties expect to raise any outstanding issues regarding written discovery with the Court in December. Depositions have not yet been noticed.

Very truly yours,

/s/ Jennifer A. Golinveaux

Jennifer A. Golinveaux
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cc.: All counsel